

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

UNITED STATES OF AMERICA

v.

HANA F. AL JADER

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Cr. No. 05-10085-RCL

JOINT MOTION TO CONTINUE TRIAL

The United States of America (“the government”) and Hana F. Al Jader (“the defendant”), by and through their respective undersigned attorneys, hereby jointly move this Honorable Court to continue the Trial in this matter set for May 1, 2006 to June 5, 2006.

As the basis for this motion, undersigned defense counsel states that earlier this month, his mother-in-law unexpectedly passed away. The sudden death in undersigned defense counsel’s family compelled him to reschedule his pending matters to dates later this spring, including a long standing trial date in United States v. David Lafleur, Cr. No. 04-10152-JLT. With the assent of both parties in that case, the Court (Tauro, J.) rescheduled the Lafleur trial from March 13, 2006 to May 1, 2006, the first available “next date” in his session. Undersigned defense counsel discussed the scheduling of the trials in both this and the Lafleur matters with Assistant United States Attorney and Chief of the Public Corruption Unit Brian T. Kelly prior to rescheduling that case. Mr. Kelly, who is the lead prosecutor on the Lafleur matter, and undersigned defense counsel, both believed that, given that Lafleur is substantially older, had previously been set for trial twice before, and involved a federally detained witness in Lafleur who was specifically transferred back to the District

of Massachusetts early this month and is temporarily housed in county jail facilities in order for him to be available to testify at trial, the Lafleur trial should precede the trial in this matter.

Furthermore, the parties in this matter (Al Jader) are still engaged in good faith negotiations regarding a possible resolution short of trial. Both sides remain hopeful that the additional month requested herein might result in an agreement that will spare the Court and both sides a lengthy and protracted trial on the merits. Hence, the parties respectfully ask the Court to continue the trial in this matter to June 5, 2006. Moreover, the parties further ask the court to extend the time for submitting the scheduled pretrial disclosures in the matter by one month. Accordingly, the parties also ask that the Court extend the deadline for the first pretrial disclosure from April 10, 2006 to May 10, 2006, and then extend the remaining pretrial disclosure deadlines each accordingly by one month.

WHEREFORE, the parties ask the court to allow their joint motion, extend the pretrial disclosure deadlines by one month, and continue the trial in this matter to June 5, 2006.

Dated: April 1, 2006

Respectfully submitted,

HANA F. AL JADER,
By her attorneys,

/s/ Brad Bailey

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